

**DATA REQUEST #16**  
**PUBLIC HEALTH**

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**BACKGROUND**

Attachment D, Revised Air Quality Modeling Protocol (contained in Appendix B, Air Quality Data) states: "All receptors that HARP creates that are inside the fence will be excluded." This eliminates evaluation of risks to on-site workers. While the project is designed for unmanned operation (Section 2.13), it is health-conservative to evaluate on-site risks to the occasional worker, especially for acute health hazard.

**DATA REQUEST**

16. Please include assessment of acute health risks to the on-site worker.

**DATA RESPONSE**

Applicant believes that the assessment of health risks to onsite workers is not required per the OEHHA HRA guidelines. However, the maximum acute health risk predicted at the onsite receptor was 0.468, less than significant.

The following excerpts come from the Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxics Hot Spots Program Risk Assessment Guidelines – The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA 2003). They show that it is not necessary to examine the health effects to onsite workers unless required by RCRA/CERCLA or the worker resides on site.

"If a facility must also comply with the RCRA/CERCLA HRA requirements, health effects to onsite workers may also need to be addressed. The DTSC's Remedial Project Manager should be consulted on this issue. In some cases it may be appropriate to evaluate risks to on-site receptors. The district should be consulted about special cases for which evaluation of on-site receptors is appropriate, such as facilities frequented by the public or where people may reside (e.g., military facilities)."

"Some situations may require that on-site receptor (worker or residential) locations be evaluated. Some examples where the health impacts of on-site receptors may be appropriate could be military base housing, prisons, universities, or locations where the public may have regular access for the appropriate exposure period (e.g., a lunch time café or museum for acute exposures). The risk assessor should contact the District for guidance if on-site exposure situations are present at the emitting facility."

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“On-site workers are protected by CAL OSHA and do not have to be evaluated under the Hot Spots program, unless the worker also lives on the facility site, or property. Occasionally, facilities like prisons, military bases, and universities have worker housing within the facility. In these situations the evaluation of on-site cancer risks, and/or acute and chronic non-cancer hazard indices is appropriate under the Hot Spots program.”